

**From:** Kassner, Gillian (USANYE) Gillian.Kassner@usdoj.gov

**Subject:** Re: [EXTERNAL] 3rd Request/Privilege Log

**Date:** October 21, 2023 at 2:30 PM

**To:** Paul Pelletier pepelletier3@gmail.com, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov

Received — thank you.

**Gillian Kassner**

Assistant United States Attorney  
United States Attorney's Office  
Eastern District of New York

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**From:** Paul Pelletier <pepelletier3@gmail.com>

**Sent:** Saturday, October 21, 2023 4:35:32 PM

**To:** Kassner, Gillian (USANYE) <GKassner@usa.doj.gov>; Siegel, Jonathan (USANYE) <JSiegel@usa.doj.gov>; Elbert, Lauren (USANYE) <LElbert@usa.doj.gov>; November, Anna (USANYE) [Contractor] <ANovember@usa.doj.gov>

**Subject:** [EXTERNAL] 3rd Request/Privilege Log

Dear Gillian,

Please find [linked](#) OneTaste's production of email communications in response to the third request of the February 21, 2023 subpoena, and attached the corresponding privilege log. OneTaste will make a follow up production next week with the remaining responsive text communications.

This request in the subpoena refers to "OneTaste members." "OneTaste members" is not defined in this or any other subpoena issued to the company.

I note that in the indictment of Nicole Daedone and Rachel Cherwitz unsealed on June 6, 2023, the government stated that "Individuals who associated themselves with OneTaste, either as employees, or as frequent participants in OneTaste courses and events, identified themselves as "members" of OneTaste."

Over 35,000 people attended in person events offered by OneTaste or licensees of OneTaste authorized to use the OneTaste name and offer courses developed by the company. It is not clear which of these individuals the government would consider to be "OneTaste members" or what level of participation the government would consider frequent.

OneTaste Inc is also not aware of people describing themselves as "OneTaste Members," other than in the following two circumstances, which do not appear to be what the government is referring to:

(1) From 2015 to 2018 OneTaste offered a one-year program called Membership. Those who participated in this specific program were called "OneTaste Members".

(2) In 2008, OneTaste offered a membership program in which people paid \$100/month to be a "OneTaste member", and received discounts on course and members-only events and workshops.

We did not think you desired to limit your request to that narrow definition of a Onee Taste Member, so In responding to this request, OneTaste has attempted to locate all communications in the company's possession "regarding [REDACTED] and/or [REDACTED]."

If you have any questions please let me know, Pep